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*The Travelers Indemnity Company of Connecticut*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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RAYMOND'S RESTAURANT	:	
CORPORATION d/b/a RAYMOND'S	:	<b><u>NOTICE OF REMOVAL</u></b>
(MONTCLAIR) and RAYMOND'S	:	
RIDGEWOOD, LLC,	:	Civil Action No.: 24-cv-11189
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE TRAVELERS INDEMNITY	:	
COMPANY OF CONNECTICUT	:	
and ACE PROPERTY AND CASUALTY	:	
INSURANCE COMPANY,	:	
	:	
Defendants.	:	
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TO THE HONORABLE JUDGES OF THE UNITED STATES  
DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY:

Defendant **THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT**

("Travelers"), by its undersigned attorneys, petitions for the removal of the above-captioned case as follows:

1. This Notice of Removal is filed pursuant to 28 U.S.C. § 1441, *et seq.*, to remove this action, commenced in the Superior Court of New Jersey, Essex County, Docket No.: ESX-L-7974-24 ("the State Court Action"). Removal is effected upon the

diversity of the parties and because the amount in controversy exceeds \$75,000.00, pursuant to 28 U.S.C. § 1332(a)(1).

2. On or about November 14, 2024, the plaintiffs, Raymond's Restaurant Corporation d/b/a Raymond's (Montclair) ("Raymond's Montclair") and Raymond's Ridgewood, LLC ("Raymond's Ridgewood"), commenced this action by filing a Complaint in the Superior Court of New Jersey, Essex County (Exhibit 1).

3. The Complaint contains two causes of action alleging two breaches by Travelers of an insurance policy provided to Raymond's Montclair and a third cause of action against Travelers alleging "insurer bad faith".

4. The Complaint asserts similar claims against co-defendant Ace Property and Casualty Insurance Company ("Ace"), which is alleged to have insured Raymond's Ridgewood.

5. Travelers was served with the Summons and Complaint by service upon the New Jersey Commissioner of Banking and Insurance on November 18, 2024 (Exhibit 2).

6. Ace also was served with the Summons and Complaint by service upon the New Jersey Commissioner of Banking and Insurance on November 18, 2024 (Exhibit 3).

7. As alleged in the Complaint, the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

8. To the best of counsel's knowledge, no other papers have been filed and no further proceedings have occurred in the State Court Action.

9. This Notice of Removal is filed within the time provided by 28 U.S.C. § 1446(b) and is the first application to remove the State Court Action.

10. The State Court Action is a suit of a wholly civil nature over which the United States District Court for the District of New Jersey has original jurisdiction by virtue of 28 U.S.C. § 1332 (diversity of citizenship), and is one that may be removed to this Court pursuant to 28 U.S.C. § 1441.

11. As set forth in the Complaint, the plaintiffs are both corporations organized and existing pursuant to the laws of the State of New Jersey, with their principal place of business in Montclair, New Jersey.

12. Travelers is a corporation organized and existing pursuant to the laws of the State of Connecticut, with its principal place of business in Hartford, Connecticut.

13. Ace is a corporation organized and existing pursuant to the laws of the Commonwealth of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania.

14. As the amount in controversy exceeds \$75,000 (exclusive of interest and costs), and there is complete diversity of citizenship, the requirements of 28 U.S.C. § 1332(a) are satisfied.

15. Ace has consented to the removal of this action to this Court (*see* Exhibit 2).

16. Written notice of the filing of this Notice of Removal will be given to Plaintiffs and filed with the Clerk of the Superior Court, Essex County, as required by 28 U.S.C. § 1446(d).

**WHEREFORE**, Travelers respectfully requests that this action be removed from the Superior Court of New Jersey, Essex County, to the United States District Court for the District of New Jersey.

Respectfully submitted,

**CHIESA SHAHINIAN & GIAN TOMASI PC**  
Attorneys for Defendant  
*The Travelers Indemnity Company of Connecticut*

By: /s Adam P. Friedman  
Adam P. Friedman

Dated: December 16, 2024